

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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CMG HOLDINGS GROUP, INC., as successor to :  
XA THE EXPERIENTIAL AGENCY, INC., :

Civil Action No.: 15-cv-05814-JPO

Plaintiff, :

vs. :

**DECLARATION OF JEAN WILSON  
IN SUPPORT OF DEFENDANTS'  
MOTION TO DISMISS PLAINTIFF'S  
AMENDED COMPLAINT**

JOSEPH WAGNER, HUDSON GRAY LLC, :  
DARREN ANDERECK, JESSIE LOMMA, :  
MICHAEL DAY, JEAN WILSON, ESTELLE :  
PIZZO, STUDIO AG, LLC, REMIGIO GUDIN, :  
and MIXED COMPANY, INC., :

Defendants. :

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JOSEPH WAGNER, JEFFREY SMITH, DARREN :  
ANDERECK, and JESSIE LOMMA, :

Third-Party Plaintiffs, :

vs. :

GLENN LAKEN and ALEXIS LAKEN, :

Third-Party Defendants. :  
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**JEAN WILSON**, pursuant to 28 U.S.C. § 1746, hereby declares under penalty of perjury  
that the following is true and correct:

1. I am a defendant herein and am the Chief Operating Officer of defendant  
HudsonGray, Inc. I am fully familiar with the facts and circumstances set forth below.

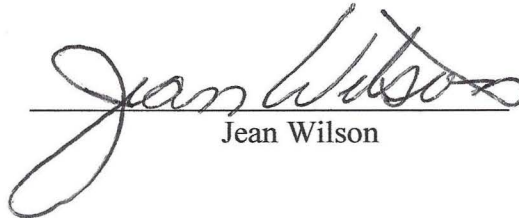
2. I submit this Declaration in support of Defendants' motion to dismiss the First  
Amended Complaint, pursuant to Federal Rule of Civil Procedure 12(b)(6).

**No Agreement With XA**

3. While I was employed with XA, I never signed any employment handbook that contained a non-solicitation provision, or entered into any written employment or non-solicitation agreement.

**WHEREFORE**, I respectfully request that this Court grant Defendants' motion to dismiss the First Amended Complaint.

Executed on August 7, 2015.

  
Jean Wilson